

# Privacy Policy

## Who we are

If you are a Limber worker or hirer, this policy applies to you. Limber, or Limber Jobs Limited is registered as a data controller at the UK Information Commissioner's Office under number ZA266215.

- 1.1 This privacy policy is incorporated into the Limber Worker Terms and Conditions and the Limber Hirer Terms and Conditions. Unless otherwise stated, capitalised words in this Privacy Policy have the same meaning as set out in Limber's Worker Terms and Conditions or Limber's Hirer Terms and Conditions.
- 1.2 You consent to Limber holding and processing data relating to You for legal, personnel, administrative and management purposes including the processing of any "sensitive personal data" as set out in the table below and the remainder of this document (together, "**YOUR INFORMATION**"),

## What personal data we collect and why we collect it

Part of the product	Data collected	Purpose	Legal basis of processing
<b>Workers on the limber app</b>			
Sign up	Name	On worker profiles	Performance of our services/Contract, legal obligation, consent, legitimate interest
	Email address	For notification emails and general contact and to let You know about system updates, new features and important info.	Performance of our services/Contract, consent, legitimate interest
	Password	Encrypted at rest using PBKDF2	Performance of our services/Contract, consent, legitimate interest

Create basic profile	Profile picture	On worker profiles and for right to work checks	Performance of our services/Contract, consent, legitimate interest
	"introduce yourself"	On worker profiles	Performance of our services/Contract, consent, legitimate interest
	Phone number	For general contact	Performance of our services/Contract, consent, legitimate interest
Experience	Venue experience Venue type Start year End year The roles you did there Text description	On worker profiles	Performance of our services/Contract, consent, legitimate interest
	Skills	Self selected level of experience	Performance of our services/Contract, consent, legitimate interest
Education	Level Name of university Start year End year	On worker profiles	Performance of our services/Contract, consent, legitimate interest
	Training	Free text	On worker profiles
Right to work checks	Passport photo Nationality Date of birth Gender DOB NI number	For right to work checks	Performance of our services/Contract, legal obligation, consent, legitimate interest
New joiner information	New joiner survey re benefits and student loans etc.	For payroll	Performance of our services/Contract, legal obligation, consent, legitimate interest

Using the platform	The time users visit each page of the app or touch each button in the platform	We store and analyse this to address complaints, bugs and to make improvements.	Performance of our services/Contract, consent, legitimate interest
	Shifts worked Timesheets Total earnt	For payroll	Performance of our services/Contract, consent, legitimate interest
	Account number and sort code	For payroll	Performance of our services/Contract, consent, legitimate interest
	Ratings and feedback for each shift	On worker profiles	Performance of our services/Contract, consent, legitimate interest
	Message history	For compliance reasons and to resolve issues.	Performance of our services/Contract, legal obligation, consent, legitimate interest

#### **Hirers on the limber app**

Sign up	Name	For identity purposes	Performance of our services/Contract, legal obligation, consent, legitimate interest
	Email address	For notification emails and general contact and to let You know about system updates, new features and important info.	Performance of our services/Contract, consent, legitimate interest
	Password	Encrypted at rest using PBKDF2	Performance of our services/Contract, consent, legitimate interest
	Business name	For due diligence reasons to ensure that hirers are legitimate	Performance of our services/Contract, legal obligation, consent, legitimate interest

	Phone number	For general contact and to resolve issues and complaints	Performance of our services/Contract, legal obligation, consent, legitimate interest
Settings	Invoice CC email	For billing purposes	Performance of our services/Contract, consent, legitimate interest
	Venue address	For due diligence reasons to ensure that hirers are legitimate	Performance of our services/Contract, legal obligation, consent, legitimate interest
Using the platform	The time users visit each page of the app or touch each button in the platform	We store and analyse this to address complaints, bugs and to make improvements.	Performance of our services/Contract, consent, legitimate interest
	Venue names	Necessary for workers to understand where to go and for safety reasons	Performance of our services/Contract, legal obligation, consent, legitimate interest
	Shifts drafted and shifts posted	For the fundamental performance of the platform	Performance of our services/Contract, consent, legitimate interest
	Money owed	To collect payment via payment method	Performance of our services/Contract, consent, legitimate interest
	Ratings and feedback for each shift	On worker and hirer profiles	Performance of our services/Contract, consent, legitimate interest
	Invoices	To track payment	Performance of our services/Contract, legal obligation, consent, legitimate interest
	Message history	For compliance reasons and to resolve issues.	Performance of our services/Contract, consent, legitimate interest

## What we do with your data

- 1.3 We may need to provide Your Information to those certain third parties (such as advisers), regulatory authorities, governmental or quasi-governmental organisations and potential purchasers of Limber or any part of its business.
- 1.4 We may need to transfer Your Information outside the European Economic Area for purposes connected with the performance of this agreement only.
- 1.5 We use Your Information in order to:
  - (a) to enable You to access and use the Limber App;
  - (b) to enable You to communicate with other Limber App users, including but not limited to by sending them messages or other information relating to Shifts;
  - (c) to operate, protect, improve and optimize the Limber App, the Limber business, and our users' experience, such as to perform analytics, conduct research, personalize or otherwise customize Your experience, and to provide customer service;
  - (d) to help create and maintain a trusted and safer environment on the Limber App and, such as detection and prevention of actual and potential fraud and other harmful activity, conducting investigations and risk assessments, enforcing our terms and conditions, verifying users, verifying any identifications provided by You (including by comparing the photo on that identification to another photo You provide to us), and conducting checks against databases and information sources (such as but not limited to public government databases) for fraud detection and prevention, risk assessment and harm prevention purposes. In this regard, we may do any or all of the foregoing with or without further notifying You;
  - (e) to send You service, support and administrative messages, reminders, technical notices, updates, security alerts, and information requested by You;
  - (f) to send You marketing, advertising, and promotional messages and other information that may be of interest to You, including information about Limber, our services, or general promotions for partner campaigns and services;
  - (g) to administer referral programs, rewards, surveys, or other promotional activities or events sponsored or managed by Limber or any business partner;
  - (h) to perform right to work checks on Workers to ensure that they have the right to work in the UK; and
  - (i) to comply with our legal obligations, resolve any disputes that we may have with any of our users, and enforce our agreements with third parties.
- 1.6 **Sharing Your Information**
  - (a) All information contained on your worker profile or displayed on your shift ads will be displayed to other Limber App users and You consent to our use of the same in marketing materials including on all social media platforms and any messages

written by You on the Limber App will be visible to other users of the Limber App (along with Your photo);

- (b) We disclose all Employment Information to tax authorities, payroll providers and any third party for the purposes of paying to You Your Rate of Pay;
- (c) We may also engage third parties, who may be located outside of the EEA, to provide services to us, including but not limited to technology services and services to help verify Your identification, to help match the photo on Your ID to other photos of Yourself You send to us, to conduct checks against databases such as but not limited to public government databases (where legally allowed), to otherwise assist us with fraud prevention and risk assessment and right to work checks, to assist us with customer service, to serve targeted ads or to provide push notifications. We may provide You information to these third parties, or give them access to this information, for the limited purpose of allowing them to provide these services.
- (d) You acknowledge, consent and agree that Limber may access, preserve and disclose Your Information if required to do so by law or as is reasonably necessary (a) to respond to claims asserted against Limber; (b) to comply with legal process including legal process associated with national security and law enforcement; (c) to enforce and administer our agreements with users, (d) for fraud prevention, risk assessment, investigation, customer support, product development and de-bugging purposes; (e) to protect the rights, property or personal safety of Limber, its users or members of the public; or (f) to any tax authority for any reason.
- (e) We may also publish, disclose and use non-personal information for industry and market analysis, demographic profiling, marketing and advertising, and other business purposes.

## 1.7 Changes

We may change how we collect and then use Personal Information at any time and without prior notice, at our sole discretion. We may change this Privacy Policy at any time. If we make material changes to the Privacy Policy, we will notify You either by posting the changed Privacy Policy on the Platform or by sending an email to You. Your continued use of the Limber App will constitute acceptance of any such changes.

# What rights you have over your data

## 1.8 Your choices

- (a) You can choose not to provide us with personal data  
If you choose to do this, you can continue to use the Limber App and browse its pages, but we will not be able to work shifts or hire staff without us having Your Information.
- (b) You can turn off notifications in your settings

You can block notifications by activating a setting on your device. If you turn off notifications, you may not find out about important events.

- (c) You can ask us not to use your data for marketing

We will inform you (before collecting your data) if we intend to use your data for marketing and if third parties are involved. You can opt out from marketing by updating your notification settings on your Account page on the app or Limber App.

## 1.9 Your rights

You can exercise your rights by sending us an email at [admin@limber.work](mailto:admin@limber.work).

- (a) You have the right to access information we hold about you. We will provide you with the information within one month of your request, unless doing so would adversely affect the rights and freedoms of other (e.g. another person's confidentiality or intellectual property rights). We'll tell you if we can't meet your request for that reason.
- (b) You have the right to make us correct any inaccurate personal data about you
- (c) You can object to us using your data for profiling you or making automated decisions about you
- (d) You have the right to port your data to another service

We will give you a copy of your data in CSV or JSON so that you can provide it to another service. If you ask us and it is technically possible, we will directly transfer the data to the other service for you. We will not do so to the extent that this involves disclosing data about any other individual.

- (e) You have the right to be 'forgotten' by us

You can do this by asking us to erase any personal data we hold about you, if it is no longer necessary for us to hold the data for purposes of your use of Limber.

- (f) You have the right to lodge a complaint regarding our use of your data

Please tell us first, so we have a chance to address your concerns. If we fail in this, you can address any complaint to the UK Information Commissioner's Office, either by calling their helpline or as directed on their website at [www.ico.org.uk](http://www.ico.org.uk).

## Where we send or store your data

- 1.10 We have physical, electronic, and managerial procedures to safeguard and secure the information we collect.

- 1.11 But please remember:

- (a) You provide personal data at your own risk: unfortunately, no data transmission is guaranteed to be 100% secure
  - (b) You are responsible of your username and password: keep them secret and safe!
  - (c) If you believe your privacy has been breached, please contact us immediately on admin@limber.work
- 1.12 The personal data we collect is processed at our offices in Bristol and in any data processing facilities operated by the third parties identified below.
- 1.13 By submitting your personal data, you agree to this transfer, storing or processing by us. If we transfer or store your information outside the EEA in this way, we will take steps to ensure that your privacy rights continue to be protected as outlined in this Privacy Policy.

## Third parties who process your data

- 1.14 Tech businesses often use third parties to help them host their application, communicate with customers, power their emails etc. We partner with third parties who we believe are the best in their field at what they do.
- 1.15 When we do this, sometimes it is necessary for us to share your data with them in order to get these services to work well. Your data is shared only when strictly necessary and according to the safeguards and good practices detailed in this Privacy Policy.
- 1.16 Here are the details of our main third-party service providers, and what data they collect or we share with them, where they store the data and why they need it:

Part of the product	Data collected	Purpose/who it is shared with	Legal basis of processing
<b>Both workers and hirers</b>			
Intercom	IP address Name Email address Data passed from Segment to Intercom	Intercom for the purposes of customer care	Performance of our services/Contract, consent, legitimate interest
Mixed Panel	IP address Data Analytics	Mixed panel for the purposes of product improvement	Performance of our services/Contract, consent, legitimate interest



AWS	Platform database Platform logs	AWS for the fundamental performance of the platform	Performance of our services/Contract, consent, legitimate interest
One Signal	Phone make and model	OneSignal for the purpose of push notifications for the platform	Performance of our services/Contract, consent, legitimate interest
Slack	Business name Message history Shifts posted/worked Ratings and feedback for all shifts	Slack for the purpose of product improvement	Performance of our services/Contract, legal obligation, consent, legitimate interest
Google Analytics	IP address Country Device make and model	Google Analytics for the purpose of product improvement	Performance of our services/Contract, consent, legitimate interest
Hotjar	Session recording of visits to limber.work	Hotjar for the purpose of product improvement	Performance of our services/Contract, consent, legitimate interest
Segment	Data pass through to other 3rd party products	Segment for the purpose of product improvement	Performance of our services/Contract, consent, legitimate interest
Google	Data extracts from workers for the purposes of: - right to work checks (when not properly carried out in app) - payroll - improving the service	Google for the purposes of storage of data	Performance of our services/Contract, consent, legitimate interest

**Hirers on the limber app**

Full Story	IP address Name Session recording of visits to the	Full Story for the purposes of product improvement	Performance of our services/Contract, consent, legitimate interest
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platform

Sage Pay	Card number Expiry date CVC number Card billing address	Sage Pay for the purposes of secure payment	Performance of our services/Contract, consent, legitimate interest
GoCardless	Account number Sort code	GoCardless for the purposes of secure payment	Performance of our services/Contract, consent, legitimate interest

**Workers on the Limber App**

Rollbar	Application logs	Rollbar for the purpose of product improvement	Performance of our services/Contract, consent, legitimate interest
Firebase	Email address	Firebase for authentication on the platform	Performance of our services/Contract, consent, legitimate interest
Brightpay	All data required to execute payroll including, name, address, national insurance number, new joiner information, amount owed, tax code	Brightpay to execute payroll	Performance of our services/Contract, legal obligation, consent, legitimate interest
Telleroo	Name, email address, amount owed, account number, sort code	Telleroo to pay workers	Performance of our services/Contract, legal obligation, consent, legitimate interest
Session Stack	IP address Name Session recording of visits to the platform	Session Stack for the purposes of product improvement	Performance of our services/Contract, consent, legitimate interest

Typeform

All new joiner  
information

Typeform for the purposes of the running  
payroll

Performance of our  
services/Contract,  
consent, legitimate  
interest